

## **ATTACHMENT “B”-STATEMENT OF BASIS**

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

DRAFT PERMIT NO. F-01-021  
DORIC PRODUCTS, INC.  
435 MOREN ROAD, LONDON, KENTUCKY  
JUNE 23, 2001  
FROUGH SHERWANI, REVIEWER  
PLANT I.D. # 021-125-00091  
APPLICATION LOG # 53827

**SOURCE DESCRIPTION:**

Doric Products, Inc. is located at London, Kentucky, manufactures metal grave vaults. Regulation 50: 031 applied to the source. The source has applied for 52:030.

<b>Emission Point</b>	<b>01</b>	<b>Spray Booth</b>
	<b>MP1</b>	<b>High Volume Low Pressure Applicator</b>
	<b>MP2</b>	<b>Clean Up</b>

**MP1:**

This point is for five HVLP spray guns and one Garco airless gun. Only one operator and gun operates in booth at a time. The “PTE” is based on 18.6 gallons per hour. The assumed transfer efficiency of the system is 70%.

**MP2**

This point is for clean up solvent. The consumption of solvent is 0.25 gallons per day. The “PTE” is based on 8760 hrs per year.

<b>Emission Point</b>	<b>02</b>	<b>Spray Booth</b>
	<b>MP1</b>	<b>High Volume Low Pressure Applicator</b>
	<b>MP2</b>	<b>Clean Up</b>

**MP1**

This point is for three HVLP spray guns and one Garco airless gun. Only one operator and gun operates in booth at a time. The “PTE” is based on 18.6 gallons per hour. The assumed transfer efficiency of the system is 70%.

**MP2**

This point is for clean up solvent. The consumption of solvent is 0.25 gallons per day. The “PTE” is based on 8760 hrs per year

<b>Emission Point</b>	<b>03</b>	<b>Spray Booth</b>
	<b>MP1</b>	<b>High Volume Low Pressure Applicator</b>
	<b>MP2</b>	<b>Clean Up</b>

**MP1:**

This point is for five HVLP spray guns and one Garco airless gun. Only one operator and gun operates in booth at a time. The “PTE” is based on 18.6 gallons per hour. The assumed transfer efficiency of the system is 70%.

**MP2**

This point is for clean up solvent. The consumption of solvent is 0.25 gallons per day. The “PTE” is based on 8760 hrs per year

<b>Emission Point</b>	<b>04</b>	<b>Spray Booth</b>
	<b>MP1</b>	<b>High Volume Low Pressure Applicator</b>
	<b>MP2</b>	<b>Clean Up</b>

**MP1:**

This point is for two HVLP spray guns. Only one operator and gun operates in booth at a time. The “PTE” is based on 18.6 gallons per hour. The assumed transfer efficiency of the system is 70%.

**MP2**

This point is for clean up solvent. The consumption of solvent is 0.25 gallons per day. The “PTE” is based on 8760 hrs per year

<b>Emission Point</b>	<b>05</b>	<b>Space Heaters</b>
-----------------------	-----------	----------------------

This point is for space heaters to heat the source during the winter. Natural gas is used as fuel. There are two heaters with the capacity of 1mmBTU per hr each. This is an insignificant activity.

<b>Emission Point</b>	<b>06</b>	<b>Welding</b>
-----------------------	-----------	----------------

This points is for MIG welding. There are 19 machines in the plant. The consumption of electrode is 1.45 lb per hr per machine. This is an insignificant activity.

<b>Emission Point</b>	<b>07</b>	<b>Drying Ovens</b>
-----------------------	-----------	---------------------

This point is for drying the product. Propane is used as fuel, natural gas is used as secondary fuel. There are three ovens with the capacity of 90, 500 BTU per hr. This is an insignificant activity.

**COMMENTS:****Type of control and efficiency:**

Emission points 01, 02,03 and 04 have fabric filters to control particulate matter. The control efficiency of the filter is assumed to be 95 %.

**Emission factors and their source:**

AP –42 5<sup>th</sup> edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

**Applicable regulation:**

State regulation 401 KAR 59:010, New process operations, applies to these emissions points because these are process operations that were commenced after July 2, 1975.

State regulation 401 KAR 52:030 Federally-enforceable permits for non-major sources.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

The actual emissions of HAPS for a single pollutant shall not exceed 9.0 tons per year. The combined emissions for HAPs shall not exceed 22.5 tons per year. The actual VOC emissions shall not exceed 90.0 tons per year. These annual limitations shall not be exceeded during any consecutive twelve months period for the entire source.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.